

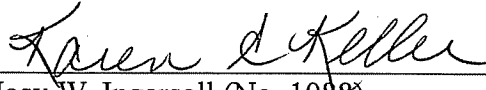
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LABORATORY SKIN CARE, INC. and	)	
ZAHRA MANSOURI,	)	
	)	
Plaintiffs,	)	
v.	)	Civil Action No. 06-601 (JJF)
	)	
LIMITED BRANDS, INC. and	)	
BATH AND BODY WORKS, LLC	)	
	)	
Defendants.	)	

**NOTICE OF 30(b)(6) DEPOSITION**

PLEASE TAKE NOTICE THAT pursuant to Rule 30 of the Federal Rules of Civil Procedure, commencing at 9:00 a.m. on May 1, 2008, or at such other date and time as shall be agreed upon by the parties or ordered by the Court, and continuing time to time thereafter, Plaintiffs Laboratory Skin Care, Inc. and Zhara Mansouri will take the deposition upon oral examination of a representative or representatives of Limited Brands Inc. and Bath and Body Works, Inc. (collectively "Defendants") concerning the subjects identified in Schedule A, attached. Please designate a representative or representatives to testify at least ten (10) business days prior to the deposition. The deposition shall take place at the offices of Rothwell, Figg, Ernst & Manbeck, 1425 K St N.W., Suite 800, Washington, D.C. 20005 or at such location as agreed to by the parties or as ordered by the Court. The deposition will be taken before an officer authorized by law to administer oaths, and will be recorded by stenographic and/or audiovisual means. You are invited to attend and cross-examine.

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Dated: April 8, 2008

*Attorneys for Plaintiffs Laboratory Skin Care, Inc. and  
Zahra Mansouri*

**SCHEDULE A**

**DEFINITIONS**

1. The term "Bath and Body Works, Inc." means defendant Bath and Body Works, Inc. and any of its divisions, departments, subsidiaries, affiliates or predecessors, and any present or former officer, director, employee, consultant, expert or agent thereof, and all other persons acting or purporting to act on behalf of BBW, its divisions, departments, subsidiaries, affiliates, or predecessors.

2. The term "Limited Brands, Inc." means defendant Limited Brands, Inc. and any of its divisions, departments, subsidiaries, affiliates or predecessors, and any present or former officer, director, employee, consultant, expert or agent thereof, and all other persons acting or purporting to act on behalf of LBI, its divisions, departments, subsidiaries, affiliates, or predecessors.

3. "Defendants" shall mean defendant Limited Brands, Inc. and Bath and Body Work, Inc. as defined above.

4. "LSC" shall mean Laboratory Skin Care®, Inc. ("LSC"), including LSC's subsidiaries, affiliates, divisions and corporate predecessors.

5. The "'516 patent" shall mean United States Patent No. 6,579,516 issued on June 17, 2003.

6. As used herein, the term "BBW anti-bacterial products" shall include each fragrance and/or scent of Bath & Body Works® Anti-bacterial Moisturizing Hand Lotion, each of the individual products identified as AB Hand Cream at BBW 006108-006109, each of the products identified as AB Hand Lotion at BBW 006110-006198, each of the products identified as AB Foot Lotion at BBW 006357-006365, and any other non-solid

triclosan-containing products sold by Defendants for which formula sheets have not been produced..

**TOPICS FOR TESTIMONY**

1. The research and development, manufacture, sale and use of each BBW anti-bacterial product.
2. The formula, chemical composition, and physical characteristics of each BBW anti-bacterial product, including but not limited to the identity and function and/or purpose of each ingredient.
3. Any testing of the BBW anti-bacterial products, including but not limited to testing of antibacterial effectiveness or moisturizing effectiveness.
4. Marketing, advertising, and promotion of the BBW anti-bacterial products.
5. The product packaging and product labeling of BBW anti-bacterial products.
6. Contracts, agreements or licenses with any third party related in any way to the BBW antibacterial products, including but not limited to the development, manufacture, supply, distribution or sale of each product.
7. The factual bases for Defendants' allegation that it does not infringe any claim of the '516 patent.
8. The unit sales, revenue and profit (gross and net) generated by Defendant for the sale of each BBW anti-bacterial product, from June 2003 to the present.
9. Royalties paid by or received by Defendants for any patent licenses relating to any BBW products and the terms of any agreements concerning such royalties.
10. Any knowledge, review, evaluation or opinions offered by or on behalf of the Defendants regarding the subject matter of the '516 patent.

11. Defendants' knowledge or awareness of the '516 patent and any communications to the infringement of and/or invalidity of the '516 patent.

12. Any and all communications between Defendants and Zahra Mansouri and/or Laboratory Skin Care, Inc.

**CERTIFICATE OF SERVICE**

I, Karen E. Keller, Esquire, hereby certify that on April 8, 2008, I caused to be electronically filed a true and correct copy of the foregoing document, Notice of 30(b)(6) Deposition, with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Francis G.X. Pileggi  
Leslie B. Spoltore  
Citizens Bank Center, Suite 1300  
919 North Market Street  
Wilmington, DE 19801-2323

I further certify that on April 8, 2008, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

**BY E-MAIL**

John F. Ward  
David M. Hill  
Ward & Olivo  
708 Third Avenue  
New York, NY 10017

*/s/ Karen E. Keller*

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